

Exhibit 3

Tuesday, November 7, 2023 at 18:57:04 Eastern Standard Time

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Chaney and Riddlehoover

Date: Thursday, August 18, 2022 at 5:25:32 PM Eastern Daylight Time

From: Ascarrunz, Veronica

To: Jennifer Dorminey Herzog, Cross, David D., Conaway, Jenna B., Bruce Brown, Marilyn@uscgg.org

CC: Kaiser, Mary, Adam M. Sparks, Russ Abney, ram@lawram.com, Cichter@ichterdavis.com, Jill Connors, Middleton, Caroline L., Halsey G. Knapp, Jr., Daniella P. Stucchi, btyson@taylorenghish.com, jballi@taylorenghish.com, dburton@taylorenghish.com, dlaross@taylorenghish.com, lparadise@taylorenghish.com, bjacoutot@taylorenghish.com, jcrumly@taylorenghish.com, cmiller@robbinsfirm.com, vrusso@robbinsfirm.com, adenton@robbinsfirm.com, jbelinfante@robbinsfirm.com, cheryl.ringer@fultoncountyyga.gov, kaye.burwell@fultoncountyyga.gov, david.lowman@fultoncountyyga.gov, Jene.Gipson@fultoncountyyga.gov, Anthony A. Rowell, Nick Kinsley, Stephen Delk

Attachments: image004.png, image005.jpg, image006.jpg, image007.jpg, image008.png, image002.jpg, image003.jpg, FW: Subpoenas to Coffee County Board of Elections and Registration and Cheney - Curling v. Raffensperger.eml

Jennifer:

To follow up on several items from our correspondence below and attached:

- Please clarify that Coffee County's 30(b)(6) witness will not assert a Fifth Amendment privilege at the deposition next week. As you know, the Supreme Court has "long recognized that, for purposes of the Fifth Amendment, corporations and other collective entities are treated differently from individuals." *Braswell v. United States*, 487 U.S. 99 (1988) ("Fifth Amendment privilege applies only to natural individuals Representatives of a "collective group" act as agents '[a]nd the official records and documents of the organization that are held by them in a representative rather than in a personal capacity cannot be the subject of the personal privilege against self-incrimination, even though production of the papers might tend to incriminate them personally.'"). *See also Sprint Nextel Corp. v. Ace Wholesale, Inc.*, No. 112-cv-02902, 2014 WL 11930612, at *2 (N.D. Ga. Mar. 19, 2014) ("a corporation may not refuse to offer testimony at a Fed. R. Civ. P. 30(b)(6) deposition on the grounds that the questions are likely to be incriminating" and citing caselaw "ruling that a corporation must provide a Rule 30(b)(6) deponent who will testify without invoking a Fifth Amendment privilege" and "has a duty to ensure that the new representative is fully prepared to testify as to the subjects specified in the Rule 30(b)(6) notice.")
- The recent depositions revealed information that suggests Coffee County still has responsive materials to produce:
 - o Mr. Chaney testified that all Board meetings were recorded on cassette and later digitally. Please produce those recordings for November 2020 through present.
 - o Multiple witnesses testified regarding security camera footage of the elections office. Please produce video footage (and any other recordings or photos from, at, or of the elections office) from November 2020 through June 2021, including whatever footage was supposedly reviewed in deciding to terminate Ms. Hampton and Ms. Riddlehoover.
 - o The produced Board meeting minutes are missing minutes from February and March 2021. Please produce those Board meeting minutes.
 - o No correspondence was produced by or between the Board members, Coffee County elections employees or agents, Ms. Hampton, and/or Ms. Riddlehoover, including text, email, or otherwise. Please confirm search and production of all responsive correspondence, especially any that concerned the copying or collection of data and ballot

images in Coffee County in late 2020 or thereafter involving third parties and the termination and/or resignations of Ms. Hampton and Ms. Riddlehoover.

- Ms. Riddlehoover testified that she filled out a time sheet every two weeks of her time during her entire employment. Please produce these as well as any purportedly fraudulent timesheets for her and Ms. Hampton, along with any related documents.
- You previously indicated that you requested and would produce from all current board members any Coffee County related responsive documents for the time period in their personal possession. No such documents were produced or logged on a privilege log. It is hard to believe no Board member has any responsive documents to produce. Please confirm that all Board members, current or active in January 2021, have in fact conducted reasonable searches of their devices for all correspondence and documents concerning the topics identified in the subpoenas.
- Please confirm whether Coffee County has a backup server or archived data that would contain Ms. Hampton's emails.
- Please confirm the County has searched the desktop computers and any other electronic equipment in the Elections Office for all responsive documents.
- Please confirm the status of your search and production of the contents of the Coffee County ICC and EMS server that were seized by the state, which are within the County's custody and control by virtue of Georgia law. (See David Cross's email of August 7.) What efforts has the county made to obtain that data and produce it in response to the subpoenas?
- What is the status of David Cross's previous questions from August 2?:
 - Where are the device contents for Ms. Hampton's phone from January 1, 2021 through the end of her employment? Only contents from before this time frame were produced.
 - Where are the documents from Ms. Hampton's Samsung Galaxy S4?
 - Did Coffee County attempt to obtain additional documents from Ms. Hampton's phone via Apple?
 - Where are the emails from Ms. Hampton's phone?
 - When can the phone be made available for our e-discovery vendors to collect data from it?
 - Did Coffee County collect and produce all images, including video, from the phone?
 - We were not able to gain access to the audio files placed in a drop box folder. Please provide that access.
 - Please confirm whether the Coffee County Board of Elections is claiming any privilege over communications with the Secretary of State's Office, the State Election Board members, any other Georgia county, anyone with Dominion, or any other third parties and the nature of such a privilege. In particular, please explain the privilege objection in response to Requests 11 and 13.
 - Please explain the nature of the privilege on your privilege log on communications with Ms. Hampton and Mr. Barnes.
 - Please supplement your privilege log with a date field.

With the 30(b)(6) deposition occurring in one week, resolution of these outstanding items is critical. If we have to move to compel documents, we will seek our fees and costs to do so, and if we have to take a second deposition because we receive documents too late to use in the upcoming deposition, we will seek our fees and costs for that as well.

Best regards,
Veronica Ascarrunz

Veronica Ascarrunz
Of Counsel | Morrison & Foerster LLP
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P: +1 (202) 887-8756

**MORRISON
FOERSTER**

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Sent: Friday, August 12, 2022 3:03 PM
To: Cross, David D. <DCross@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Marilyn@uscgg.org
Cc: Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Russ Abney <rabney@wattsguerra.com>; ram@lawram.com; Cichter@ichterdavis.com; Jill Connors <JConnors@ichterdavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; btyson@taylorenghish.com; jballi@taylorenghish.com; dburton@taylorenghish.com; dlaross@taylorenghish.com; lparadise@taylorenghish.com; bjacoutot@taylorenghish.com; jcrumly@taylorenghish.com; cmiller@robbinsfirm.com; vrusso@robbinsfirm.com; adenton@robbinsfirm.com; jbelinfante@robbinsfirm.com; cheryl.ringer@fultoncountyga.gov; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Jene.Gipson@fultoncountyga.gov; Anthony A. Rowell <ARowell@hallboothsmith.com>; Nick Kinsley <NKinsley@hallboothsmith.com>; Stephen Delk <SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Chaney and Ridlehoover

External Email

To clarify, I was referencing Chaney and Ridlehoover depositions next week with regard to that statement. We can further discuss the 30b6 witness once that date is agreed upon and scheduled.

Jennifer Dorminey Herzog

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From: Cross, David D. <DCross@mofo.com>
Sent: Friday, August 12, 2022 3:01 PM
To: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Conaway, Jenna B. <JConaway@mofo.com>; Bruce Brown <bbrown@brucepbrownlaw.com>; Marilyn@uscgg.org
Cc: Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Russ Abney <rabney@wattsguerra.com>; ram@lawram.com; Cichter@ichterdavis.com; Jill Connors <JConnors@ichterdavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; btyson@taylorenghish.com; jballi@taylorenghish.com; dburton@taylorenghish.com; dlaross@taylorenghish.com; lparadise@taylorenghish.com; bjacoutot@taylorenghish.com; jcrumly@taylorenghish.com; cmiller@robbinsfirm.com; vrusso@robbinsfirm.com; adenton@robbinsfirm.com; jbelinfante@robbinsfirm.com;

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Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Chaney and Ridlehoover

Jennifer -

Are you saying Coffee County's 30b6 witness also may assert the Fifth? If so, can you please direct us to authority that holds that a corporate representative can assert the Fifth Amendment in a Rule 30b6 deposition?

Thanks.
DC

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Date: Friday, Aug 12, 2022, 2:39 PM

To: Conaway, Jenna B. <JConaway@mofo.com>, Bruce Brown <bbrown@brucebrownlaw.com>, Cross, David D. <DCross@mofo.com>, Marilyn@uscgg.org <Marilyn@uscgg.org>

Cc: Kaiser, Mary <MKaiser@mofo.com>, Adam M. Sparks <sparks@khlawfirm.com>, Russ Abney <rabney@wattsguerra.com>, ram@lawram.com <ram@lawram.com>, Cichter@ichterdavis.com <Cichter@ichterdavis.com>, Jill Connors <JConnors@ichterdavis.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Middleton, Caroline L. <CMiddleton@mofo.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Daniella P. Stucchi <daniella@khlawfirm.com>, btyson@taylorenghish.com <btyson@taylorenghish.com>, jballi@taylorenghish.com <jballi@taylorenghish.com>, dburton@taylorenghish.com <dburton@taylorenghish.com>, dlaross@taylorenghish.com <dlaross@taylorenghish.com>, lparadise@taylorenghish.com <lparadise@taylorenghish.com>, bjacoutot@taylorenghish.com <bjacoutot@taylorenghish.com>, jcrumly@taylorenghish.com <jcrumly@taylorenghish.com>, cmiller@robbinsfirm.com <cmiller@robbinsfirm.com>, vrusso@robbinsfirm.com <vrusso@robbinsfirm.com>, adenton@robbinsfirm.com <adenton@robbinsfirm.com>, jbelinfante@robbinsfirm.com <jbelinfante@robbinsfirm.com>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, Jene.Gipson@fultoncountyga.gov <Jene.Gipson@fultoncountyga.gov>, Anthony A. Rowell <ARowell@hallboothsmith.com>, Nick Kinsley <NKinsley@hallboothsmith.com>, Stephen Delk <SDelk@hallboothsmith.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Chaney and Ridlehoover

External Email

All:

Confirming we are accepting service of these revised deposition subpoenas on behalf of Curling and CGG Plaintiffs for Mr. Chaney and Ms. Ridlehoover for depositions scheduled to take place Monday and Tuesday, beginning 10am at the Fairfield in Douglas, Georgia. I have cancelled the room reserved at the Chamber for Monday.

We were hopeful that the Coffee County Board of Elections and Registration 30b6 deposition could be scheduled for Wednesday August 17th while counsel is already in Douglas, Georgia, but because of scheduling issues that unfortunately will not work. I have been asked to notify you that the CCBOE 30b6 deponent will be board member Wendell Stone, and Mr. Stone is currently in Alaska; however, my understanding is he will be back in Douglas by Monday August 22nd. Therefore, we propose the dates of

Wednesday August 24th or Monday August 29th for the 30b6 deposition. We are of course happy to do these depositions virtually if more convenient and/or cost effective for you all.

Lastly, as we do not want there to be any misunderstanding or frustration as referenced in previous depositions we have observed in this case - our clients will appear but may or may not take the 5th in response to certain questions as the deponent and/or counsel in attendance deem appropriate.

Jennifer Herzog

Jennifer Dorminey Herzog

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From: Conaway, Jenna B. <JConaway@mofo.com>

Sent: Thursday, August 11, 2022 6:53 PM

To: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Bruce Brown

<bbrown@brucebrownlaw.com>; Cross, David D. <DCross@mofo.com>; Marilyn@uscgg.org

Cc: Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Russ Abney

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<ARowell@hallboothsmith.com>; Nick Kinsley <NKinsley@hallboothsmith.com>; Stephen Delk

<SDelk@hallboothsmith.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

Ms. Herzog,

Could you please confirm that you accept service of these revised deposition subpoenas for Mr. Chaney and Ms. Ridlehoover? The depositions are scheduled to take place Monday and Tuesday, beginning 10am at:

Fairfield Inn & Suites by Marriott Douglas
1815 Peterson Ave S, Douglas, GA 31533

Thank you,

Jenna Conaway

Senior Paralegal
jconaway@mofo.com
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Morrison Foerster
2100 L Street, NW Suite 900
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From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Sent: Thursday, August 11, 2022 10:48 AM
To: Bruce Brown <bbrown@brucebrownlaw.com>; Cross, David D. <DCross@mofo.com>;
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Cc: Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Russ Abney <rabney@wattsguerra.com>; ram@lawram.com;
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jballi@taylorenghish.com; dburton@taylorenghish.com; dlaross@taylorenghish.com;
lparadise@taylorenghish.com; bjacoutot@taylorenghish.com; jcrumly@taylorenghish.com;
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<SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

External Email

I just called – the Chamber is not available for Tuesday 16th. I did not cancel Monday 8/15 yet until I received confirmation from you all that you wanted to move to another location for that day also. Chamber suggested Fairfield, Hampton Inn and Holiday Inn Express conference rooms as alternatives. Our recommendation of those three would be Fairfield. The courthouse also has a few rooms that may be available but you would need to contact the Coffee County Clerk of Court Lisa Gillis to determine availability – 912.384.2865.

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

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From: Bruce Brown <bbrown@brucebrownlaw.com>

Sent: Thursday, August 11, 2022 9:45 AM

To: Cross, David D. <DCross@mofo.com>; Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Marilyn@uscgg.org

Cc: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Russ Abney <rabney@wattsguerra.com>; ram@lawram.com; Cichter@ichterdavis.com; Jill Connors <JConnors@ichterdavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; btyson@taylorenghish.com; jballi@taylorenghish.com; dburton@taylorenghish.com; dlaross@taylorenghish.com; lparadise@taylorenghish.com; bjacoutot@taylorenghish.com; jcrumly@taylorenghish.com; cmiller@robbinsfirm.com; vrusso@robbinsfirm.com; adenton@robbinsfirm.com; jbelinfante@robbinsfirm.com; cheryl.ringer@fultoncountyga.gov; kaye.burwell@fultoncountyga.gov; david.lowman@fultoncountyga.gov; Jene.Gipson@fultoncountyga.gov; Anthony A. Rowell <ARowell@hallboothsmith.com>; Nick Kinsley <NKinsley@hallboothsmith.com>; Stephen Delk <SDelk@hallboothsmith.com>

Subject: Re: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

Please add Marilyn to emails I'm this chain so we can coordinate efforts.

Thanks

On Aug 11, 2022, at 9:29 AM, Cross, David D. <DCross@mofo.com> wrote:

Please go ahead and see if you can get space at the chamber for Tuesday since the deposition is confirmed. We will get back to you on the 30b6, but please understand that if we finish Mr. Cheney's personal deposition early enough on Monday that we also could have completed the 30b6 the same day, your client will need to pay our costs and fees to do the deposition another day. We had an agreement and your client should adhere to it.

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Date: Thursday, Aug 11, 2022, 9:22 AM

To: Cross, David D. <DCross@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; bbrown@brucebrownlaw.com <bbrown@brucebrownlaw.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@ichterDavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>;

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Cc: Anthony A. Rowell <ARowell@hallboothsmith.com>, Nick Kinsley <NKinsley@hallboothsmith.com>, Stephen Delk <SDelk@hallboothsmith.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

External Email

We will be glad to reserve the Chamber conference rooms for the needed dates next week, if they are available (please come prepared to pay the date of the deposition). I will call as soon as we have the date for the 30b6 decided upon.

We will need to do the 30b6 deposition later in the week or another date agreed upon. Please let us know your preference.

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

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From: Cross, David D. <DCross@mofo.com>

Sent: Thursday, August 11, 2022 9:08 AM

To: Jennifer Dorminey Herzog <jdherzog@hallboothsmith.com>; Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; 'bbrown@brucepbrownlaw.com' <bbrown@brucepbrownlaw.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>; 'cmiller@robbinsfirm.com' <cmiller@robbinsfirm.com>;

'vrusso@robbinsfirm.com' <vrusso@robbinsfirm.com>; 'adenton@robbinsfirm.com' <adenton@robbinsfirm.com>; 'jbelinfante@robbinsfirm.com' <jbelinfante@robbinsfirm.com>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>
Cc: Anthony A. Rowell <ARowell@hallboothsmith.com>; Nick Kinsley <NKinsley@hallboothsmith.com>; Stephen Delk <SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

Jennifer -

Based on your email a moment ago, let's go ahead with both depositions on Monday and Tuesday at the Chamber of Commerce. Are you able to make the necessary reservations on Tuesday as well? We will cover the cost for a deposition room on both dates.

Regarding the 30b6, unless I'm mistaken, we agreed sometime ago that that would also happen this coming Monday and that Mr. Cheney would be the County's designee. It will be likely inefficient and expensive to depose him twice on two separate days if we can get it all done in one day, as we likely can. Having agreed to this arrangement, I don't think it's appropriate for you to refuse to accept service of a subpoena that simply reflects what was previously agreed. If I'm misremembering our agreement, please direct me to the correspondence that indicates otherwise. If I'm remembering correctly, then we need to proceed as agreed on Monday with both the corporate deposition and the individual deposition of Mr. Cheney so we can try to avoid the cost and burden of a second day.

Best,
DC

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Date: Thursday, Aug 11, 2022, 8:51 AM
To: Cross, David D. <DCross@mofo.com>, Kaiser, Mary <MKaiser@mofo.com>, Adam M. Sparks <sparks@khlawfirm.com>, Conaway, Jenna B. <JConaway@mofo.com>, 'Russ Abney' <rabney@wattsguerra.com>, 'ram@lawram.com' <ram@lawram.com>, 'bbrown@brucepbrownlaw.com' <bbrown@brucepbrownlaw.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, 'Jill Connors' <JConnors@IchterDavis.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Middleton, Caroline L. <CMiddleton@mofo.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Daniella P. Stucchi <daniella@khlawfirm.com>, 'btyson@taylorenghish.com' <btyson@taylorenghish.com>, 'jballi@taylorenghish.com' <jballi@taylorenghish.com>, 'dburton@taylorenghish.com' <dburton@taylorenghish.com>, 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>, 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>, 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>, 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>, 'cmiller@robbinsfirm.com' <cmiller@robbinsfirm.com>, 'vrusso@robbinsfirm.com' <vrusso@robbinsfirm.com>, 'adenton@robbinsfirm.com' <adenton@robbinsfirm.com>, 'jbelinfante@robbinsfirm.com' <jbelinfante@robbinsfirm.com>, 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>, 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>, 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>, 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>
Cc: Anthony A. Rowell <ARowell@hallboothsmith.com>, Nick Kinsley <NKinsley@hallboothsmith.com>, Stephen Delk <SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

External Email

David:

The subpoena for Ridlehoover has the Chamber of Commerce as the deposition location – I was not requested to nor have I reserved 8/16 with the Chamber. As I noted in correspondence just a few moments ago with regard to Cheney's deposition, we of course expect your office to bear the cost of the meeting location and have no objection to you choosing another location in Douglas, Georgia for these depositions. Please just let us know so that we may plan accordingly.

I am not aware that there is any intention to produce additional records from Cheney and/or Coffee County, but will follow up and confirm in that regard.

Thanks,

Jennifer

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

O: [229.382.0515](tel:229.382.0515)

1564 King Road

D: [229.339.8856](tel:229.339.8856)

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From: Cross, David D. <DCross@mofo.com>

Sent: Thursday, August 11, 2022 8:44 AM

To: Jennifer Dorminey Herzog <jdherzog@hallboothsmith.com>; Kaiser, Mary <MKaiser@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; 'bbrown@brucepbrownlaw.com' <bbrown@brucepbrownlaw.com>; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@lchterDavis.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>; 'cmiller@robbsinsfirm.com' <cmiller@robbsinsfirm.com>; 'vrusso@robbsinsfirm.com' <vrusso@robbsinsfirm.com>; 'adenton@robbsinsfirm.com' <adenton@robbsinsfirm.com>; 'jbelinfante@robbsinsfirm.com' <jbelinfante@robbsinsfirm.com>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>;

'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>
Cc: Anthony A. Rowell <ARowell@hallboothsmith.com>; Nick Kinsley
<NKinsley@hallboothsmith.com>; Stephen Delk <SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

Thanks, Jennifer. Is she planning to pay the cost for the Chamber of Commerce? If she's looking for us to cover the cost of location, we likely would choose a different location in the same area per a separate email that I believe you received yesterday regarding Mr. Chaney's upcoming deposition. Please let us know how you would like to proceed.

In assessing whether Ms. Riddlehoover has responsive documents, please ensure that she conducts appropriate searches for electronic and hardcopy files, including searching any social media accounts; communication apps; online/cloud repositories such as an Apple iCloud account and Google Docs; etc. that she may use currently or have used in the past. Please also make sure that her search efforts are reasonably comprehensive, for example not just searching for specific individuals' full names but also known email addresses, phone numbers, aliases, nicknames, social media handles, etc. for those individuals or organizations.

Can you also please let us know today whether additional documents are forthcoming from Coffee County and/or Mr. Chaney?

Best,
DC

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Date: Thursday, Aug 11, 2022, 8:35 AM
To: Kaiser, Mary <MKaiser@mofo.com>, Adam M. Sparks <sparks@khlawfirm.com>, Conaway, Jenna B. <JConaway@mofo.com>, 'Russ Abney' <rabney@wattsguerra.com>, 'ram@lawram.com' <ram@lawram.com>, bbrown@brucepbrownlaw.com <bbrown@brucepbrownlaw.com>, 'cichter@ichterdavis.com' <cichter@ichterdavis.com>, 'Jill Connors' <JConnors@IchterDavis.com>, Cross, David D. <DCross@mofo.com>, Ascarrunz, Veronica <VAscarrunz@mofo.com>, Middleton, Caroline L. <CMiddleton@mofo.com>, Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>, Daniella P. Stucchi <daniella@khlawfirm.com>, 'btyson@taylorenghish.com' <btyson@taylorenghish.com>, 'jballi@taylorenghish.com' <jballi@taylorenghish.com>, 'dburton@taylorenghish.com' <dburton@taylorenghish.com>, 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>, 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>, 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>, 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>, 'cmiller@robbinsfirm.com' <cmiller@robbinsfirm.com>, 'vrusso@robbinsfirm.com' <vrusso@robbinsfirm.com>, 'adenton@robbinsfirm.com' <adenton@robbinsfirm.com>, 'jbelinfante@robbinsfirm.com' <jbelinfante@robbinsfirm.com>, 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>, 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>, 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>, 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>
Cc: Anthony A. Rowell <ARowell@hallboothsmith.com>, Nick Kinsley <NKinsley@hallboothsmith.com>, Stephen Delk <SDelk@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT -Ridlehoover

External Email

Good morning,

Confirming Jil Ridlehoover is planning to appear for her deposition Tuesday 8/16 at 9am at the Coffee County Chamber of Commerce as outlined in the subpoena. A representative of our office will be present and it is my understanding that attorney Clint Lott will also be attending as additional counsel on Ms. Ridlehoover's behalf.

<https://www.clintlottlaw.com/>

Although it is my understanding she has no records responsive, also confirming we will have a formal response to you on the subpoena for document production by 8/13. Thanks,

Jennifer

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

O: [229.382.0515](tel:229.382.0515)

1564 King Road

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From: Kaiser, Mary <MKaiser@mofo.com>

Sent: Wednesday, August 10, 2022 3:58 PM

To: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; bbrown@brucebrownlaw.com; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>; 'cmiller@robbsfirm.com' <cmiller@robbsfirm.com>; 'vrusso@robbsfirm.com' <vrusso@robbsfirm.com>; 'adenton@robbsfirm.com' <adenton@robbsfirm.com>; 'jbelinfante@robbsfirm.com' <jbelinfante@robbsfirm.com>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT - Latham Inspection Subpoena

Hi Jennifer,

Can you please confirm that Ms. Ridlehoover will appear for her deposition on Tuesday August 16th at 9 am at the noticed location? And can you please confirm that she will

produce responsive documents no later than August 13th?

Thanks,
Mary

Mary Kaiser (she/her)

Partner

mkaiser@mofo.com

T +1 (202) 887-6952

M +1 (202) 938-7068

**MORRISON
FOERSTER**

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Sent: Tuesday, August 9, 2022 11:42 AM

To: Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B.

<JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com'

<ram@lawram.com>; bbrown@brucepbrownlaw.com; 'cichter@ichterdavis.com'

<cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Cross, David D.

<DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary

<MKaiser@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp,

Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>;

'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com'

<jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>;

'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com'

<lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com'

<bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>;

'cmiller@robbinsfirm.com' <cmiller@robbinsfirm.com>; 'vrusso@robbinsfirm.com'

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'jbelinfante@robbinsfirm.com' <jbelinfante@robbinsfirm.com>;

'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>;

'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>;

'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>;

'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT - Latham Inspection Subpoena

External Email

FYI, our office has been contacted by former Coffee County employee Jil Ridlehoover who I understand has received subpoenas in this case. We will be representing her so please forward any future communications with regard to Ms. Ridlehoover to my attention.

Has a time been set for Mr. Cheney's deposition on August 15, 2022?

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

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From: Adam M. Sparks <sparks@khlawfirm.com>

Sent: Monday, August 8, 2022 5:21 PM

To: Conaway, Jenna B. <JConaway@mofo.com>; 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; 'bbrown@brucepbrownlaw.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>; 'cmiller@robbinsfirm.com' <cmiller@robbinsfirm.com>; 'vrusso@robbinsfirm.com' <vrusso@robbinsfirm.com>; 'adenton@robbinsfirm.com' <adenton@robbinsfirm.com>; 'jbelinfante@robbinsfirm.com' <jbelinfante@robbinsfirm.com>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>; Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT - Latham Inspection Subpoena

Counsel:

Please find enclosed a subpoena for inspection served on Cathleen A. Latham through her counsel.

Best regards,



Adam M. Sparks
Litigation, Regulation, Election Law
Tel: 404-835-8067
Email: sparks@khlawfirm.com
www.khlawfirm.com

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From: Conaway, Jenna B. <JConaway@mofo.com>
Sent: Wednesday, July 27, 2022 3:25 PM
To: 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; bbrown@brucebrownlaw.com; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Middleton, Caroline L. <CMiddleton@mofo.com>; Conaway, Jenna B. <JConaway@mofo.com>; Halsey G. Knapp, Jr. <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Daniella P. Stucchi <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>; 'jballi@taylorenghish.com' <jballi@taylorenghish.com>; 'dburton@taylorenghish.com' <dburton@taylorenghish.com>; 'dlaross@taylorenghish.com' <dlaross@taylorenghish.com>; 'lparadise@taylorenghish.com' <lparadise@taylorenghish.com>; 'bjacoutot@taylorenghish.com' <bjacoutot@taylorenghish.com>; 'jcrumly@taylorenghish.com' <jcrumly@taylorenghish.com>; 'cmiller@robbsinsfirm.com' <cmiller@robbsinsfirm.com>; 'vrusso@robbsinsfirm.com' <vrusso@robbsinsfirm.com>; 'adenton@robbsinsfirm.com' <adenton@robbsinsfirm.com>; 'jbelinfante@robbsinsfirm.com' <jbelinfante@robbsinsfirm.com>; 'cheryl.ringer@fultoncountyga.gov' <cheryl.ringer@fultoncountyga.gov>; 'kaye.burwell@fultoncountyga.gov' <kaye.burwell@fultoncountyga.gov>; 'david.lowman@fultoncountyga.gov' <david.lowman@fultoncountyga.gov>; 'Jene.Gipson@fultoncountyga.gov' <Jene.Gipson@fultoncountyga.gov>; Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Subject: RE: Curling v. Raffensperger, No. 1:17-cv-02989-AT - Revised Barnes & Latham Deposition Subpoenas

Counsel (including Ms. Herzog, counsel for Coffee County BOE):

The deposition of Cathleen A. Latham has been rescheduled from July 28 to August 4. We are waiting to hear back from her counsel to confirm the location.

Thanks!

Jenna Conaway
Senior Paralegal
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From: Conaway, Jenna B.
Sent: Sunday, July 17, 2022 6:52 PM
To: 'Russ Abney' <rabney@wattsguerra.com>; 'ram@lawram.com' <ram@lawram.com>; bbrown@brucebrownlaw.com; 'cichter@ichterdavis.com' <cichter@ichterdavis.com>; 'Jill Connors' <JConnors@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Ascarrunz, Veronica <VAscarrunz@mofo.com>; Kaiser, Mary <MKaiser@mofo.com>; Elson, Hannah R. <HElson@mofo.com>; 'hknapp@khlawfirm.com' <hknapp@khlawfirm.com>; 'sparks@khlawfirm.com' <sparks@khlawfirm.com>; 'Daniella P. Stucchi' <daniella@khlawfirm.com>; 'btyson@taylorenghish.com' <btyson@taylorenghish.com>;

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Subject: Curling v. Raffensperger, No. 1:17-cv-02989-AT - Revised Barnes & Latham Deposition Subpoenas

Counsel,

Please find enclosed a notice of intent to serve and revised versions of the subpoenas to testify at a deposition to James A. Barnes, Jr. and Cathleen A. Latham. Mr. Barnes' deposition will now be on Wednesday, July 20 via remote means. Ms. Latham's deposition will be on Thursday, July 28.

Thank you,

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